

**AMENDMENT UNDER 37 C.F.R. § 1.111**  
**U. S. Application No. 09/605,735**

**REMARKS**

Claims 1-11 are all the claims pending in the application. Applicants add new claims 12-16. Claims 1-4 and 8-10 are rejected under 35 U.S.C. § 102(b) as being anticipated by Bell (U.S. Patent No. 6,011,781) ("Bell"). Claim 11 is rejected under 35 U.S.C. § 102(b) as being anticipated by Zou (U.S. Patent No. 6,160,796) ("Zou"). Claim 5-7 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Zou in view of Bell. Applicants add new claims 12-16 to more particularly claim the invention and to submit the following arguments to traverse the prior art rejections.

Applicants' invention relates to a method for connecting a digital interface, and more particularly, to a method for connection management among digital devices connected through a digital interface such as IEEE 1394, in an embodiment. First, a digital device establishes a point-to-point connection. Then it is determined whether the digital device is one of two devices connected by the point-to-point connection. If it is determined that the digital device is not one of the two devices, another point-to-point connection is established for the two connected devices.

Bell relates to a communication system including a network of nodes connection in a multipoint configuration. Each of the nodes is configured to concurrently communicate with the other nodes on a point-to-point basis.

Zou relates to a method and system for updating device identification and status information in response to a local bus reset within a home audio/video network. Zou discloses a mechanism whereby devices of the network are informed of the current status of other devices

**AMENDMENT UNDER 37 C.F.R. § 1.111**  
**U. S. Application No. 09/605,735**

on the network following a local bus reset which is caused when a device is inserted into the network or when a device is removed from the network.

Rejections of Claims 1-4 and 8-10 under § 102(b) over Bell

Applicants respectfully submit that claim 1 is believed to be patentable because Bell fails to teach each and every element of the claims. For example, claim 1 recites a connection management method comprising:

(b) checking whether or not the digital device, which establishes the point-to-point connection in the step (a), is the other digital device to be connected by the point-to-point connection; and

(c) establishing another point-to-point connection to the other digital device, when the result of the step (b) indicates that the digital device, which establishes the point-to-point connection, is not the other digital device to be connected by the point-to-point connection.

In the Office Action, the Examiner states that Bell teaches in Figure 4 and column 4, line 48-53, "that the node first determines each of the other nodes is present on the network," and "[t]hen the node establishes point-to-point communication between the node and each of the other nodes determined to be present on the network." The Examiner, however, has not shown how Bell performs "checking whether or not the digital device, which established the point-to-point connection in step (a), is the other digital device to be connected by the point-to-point connection," in combination with other elements of claim 1. To the contrary, Bell merely discloses if direct "point-to-point communication has been established between the node and other nodes in the network," i.e., whether point-to-point communication has been established between the two nodes which are to be at the ends of the point-to-point connection. No mention or suggestion is made by Bell regarding the any sort of a point-to-point communication being established by a node which is not to be connected by the point-to-point connection. Therefore,

***AMENDMENT UNDER 37 C.F.R. § 1.111***  
***U. S. Application No. 09/605,735***

Bell cannot possibly perform the step of checking whether or not the digital device, which establishes the point-to-point connection, is the other digital device to be connected by the point-to-point connection.

As a consequence of not teaching or suggesting the checking step of claim 1 as recited, Bell further fails to teach or suggest establishing another point-to-point connection to the other digital device, when the result of step (b) indicates that the digital device, which establishes the point-to-point connection, is not the other digital device to be connected by the point-to-point connection. As noted above, Bell merely teaches a node establishing a point-to-point connection wherein the node is the node to be connected by the point-to-point connection. Thus, Bell fails to teach or suggest establishing another point-to-point connection as claimed because the node which establishes the point-to-point connection is always the node to be connected by the point-to-point connection.

For the above reasons, the rejection of claim 1 is not sustainable and thus claim 1 is believed to be patentable.

Claims 2-4, which depend from claim 1, are believed to be patentable for at least the reasons submitted for claim 1.

Applicants respectfully submit that claim 8 is believed to be patentable because the Examiner has not shown how each and every element of the claim is taught or suggested by Bell. For example, claim 8 recites a connection management system comprising a first digital device wherein the first digital device is operable to establish and manage a first point-to-point connection, via the digital interface bus, between other digital devices, in combination with other elements of the claim. In the Office Action, the Examiner cites Bell as teaching the above

**AMENDMENT UNDER 37 C.F.R. § 1.111**  
**U. S. Application No. 09/605,735**

aspects of the claim. To the contrary, Bell teaches a node establishing “point-to-point communication between the node and each of the other nodes.” (col. 4, lines 49-52). Unlike what is recited in the claim, Bell fails to teach or suggest any of the nodes as being operable to establish and manage a first point-to-point connection between other digital devices.

In addition, claim 8 is patentable because Bell fails to teach or suggest the second digital device being, in combination with other elements of the claim,

further operable to establish a second point-to-point connection between the second digital device and the third digital device, when the first point-to-point connection is being established between the second digital device and the third digital device and the second digital device determines that the first digital device is not to be connected to the second digital device by the first point-to-point connection.

Similar to the arguments submitted for claim 1, Bell discloses a node which determines if a point-to-point connection is established with another node. Bell, however, fails to teach or suggest any node operable to determine whether a node which establishes a point-to-point connection is one of the two nodes being connected by the established point-to-point connection.

Claims 9 and 10, which depend from claim 8, are believed to be patentable for at least the reasons submitted for claim 8.

Rejections of Claim 11 under § 102(b) over Zou

Applicants submit that claim 11 is believed to be patentable because Zou fails to teach or suggest the second digital device as recited in claim 8, from which claim 11 depends.

Rejections of Claims 5-7 under § 103(a) over Zou in view of Bell

Applicants submit that claim 5 is believed to be patentable for reasons similar to those presented for claim 1 and because Zou fails to make up for the deficiencies of Bell. Specifically, Zou in view of Bell fails to teach, suggest, or provide motivation for the steps of:

**AMENDMENT UNDER 37 C.F.R. § 1.111**  
**U. S. Application No. 09/605,735**

- (b) checking whether the connection-establishing digital device is the second digital device to be connected to the first digital device by the first point-to-point connection; and
- (c) establishing, via the first digital device, a second point-to-point connection to the second digital device, when the result of the step (b) indicates that the connection-establishing digital device is not the second digital device to be connected to the first digital device by the first point-to-point connection.

The Examiner mentions on page 9 of the Office Action that Bell teaches that “the current node determines whether it is the last node on the network to establish communication with other nodes,” and “[i]f not, the current node generates a handoff signal which is received by another node,” which “is then designated as the current node and the loop repeats beginning at step 608.” Applicants submit that Bell fails to teach, suggest, or provide motivation for the checking and establishing steps recited in the claim. In the above description of Bell, the handoff procedure to determine the current node depends on whether the last current node is the last node on the network. To the contrary, claim 5 discloses establishing, via the first digital device, a second point-to-point connection to the second digital device, when the result of the step (b) indicates that the connection-establishing digital device is not the second digital device to be connected to the first digital device by the first point-to-point connection.

For these reasons, claim 5 is believed to be patentable.

Claims 6-7, which depend from claim 5, are believed to be patentable for at least the reasons submitted for claim 5.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

**AMENDMENT UNDER 37 C.F.R. § 1.111**  
**U. S. Application No. 09/605,735**

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Respectfully submitted,



Seok-Won Stuart Lee\*

\*Granted limited recognition under  
37 C.F.R. § 10.9(b), as shown in a copy of  
the same filed on February 13, 2004, at the  
U.S.P.T.O.

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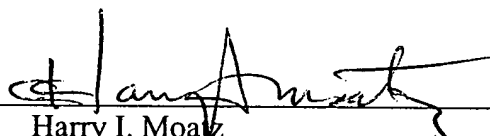
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